



**CERTIFICATION**

April 13, 2021

Via Email to [chambers\\_of\\_judge\\_wolson@paed.uscourts.gov](mailto:chambers_of_judge_wolson@paed.uscourts.gov)

United States District Court  
Eastern District of Pennsylvania  
Honorable Joshua D. Wolson  
601 Market Street  
Room 3809  
Philadelphia, PA 19106-1726

RE: Lisa Barbounis v. The Middle East Forum  
No. 2:19-cv-05030-JDW

Dear Judge Wolson:

I write to notify the Court the amount of money that Plaintiff is obligated to pay in connection with the Court's December 4, 2021 Order.

According to the Order, Plaintiff was obligated to follow certain protocols for discovery. While there were several discovery protocols, the Court required Plaintiff to complete all protocols by December 18, 2020. Moreover, Plaintiff was obligated to furnish all text threads to Defendants by December 15, 2020. This is the primary deadline that Plaintiff did not meet. Plaintiff wrote and informed the Court that the discovery vendor, Capsicum, would be unable to meet the deadline set by the Court. Plaintiff believes that he was in compliance with the Court Order by December 22, 2020, when Plaintiff filed the final certification, however, Defendants continued to object to the format of Plaintiff's discovery. It was not until December 29, 2020 that Defendants also agreed that Plaintiff's production of electronic documents was sufficient. After the December 29, 2021 production, Defendants have not requested additional written discovery in this case.

Accordingly, Plaintiff was out of compliance with the Court's December 4, 2020 Order from December 15, 2020 until December 29, 2020, which is fourteen (14) days. At \$50.00 per day, Plaintiff suggests the balance due is \$700.00.<sup>1</sup>

Very Truly Yours,  
**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson

---

<sup>1</sup> Judge Wolson: Plaintiff's counsel filed this document last night. I was working tonight on Plaintiff's Response to Defendants' Motion for Summary Judgment and noticed that this certification was not on the docket. I am unsure what happened. My internet connection from my home office can be spotty, but I was sure that this document was filed.

Seth D. Carson, Esquire

CC: